

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES

v.

KINGSLEY R. CHIN,
ADITYA HUMAD, and
SPINEFRONTIER, INC.,
Defendants.

No. 1:21-cr-10256-IT

**DEFENDANT KINGSLEY R. CHIN'S
MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant Kingsley R. Chin respectfully submits this motion to modify the conditions of release. In recognition of the fact that Dr. Chin's medical practice includes serving patients in Jamaica, Dr. Chin's current conditions of release allow him to travel to Jamaica once per month to practice medicine. (*See* ECF No. 51, at 3.) Dr. Chin respectfully requests that the limitation on travel to Jamaica to once per month be changed to up to three times per month. In support of this request, Dr. Chin states as follows:

1. Dr. Chin's Probation Officer has agreed to the expansion of Dr. Chin's ability to travel to Jamaica for purposes of his medical practice, but has correctly noted that an order from the Court is necessary to implement this change.
2. Counsel for the government has indicated that the government takes no position on this request.
3. Since his conditions of release were established, Dr. Chin has complied with the one-trip-per-month limitation on his travel to Jamaica to practice medicine. That limitation has proven to restrict unduly his practice of medicine and the quality of care he is able to provide to his patients. For example, after performing a surgery on or otherwise seeing a patient in Jamaica,

Dr. Chin is unable to continue care for that patient until he is permitted to return the following month. Dr. Chin's concern about potential complications, and his inability to address complications if they were to arise prior to his next permitted trip, have led him to restrict surgeries that he performs to less advanced spinal problems. Even for routine follow-up care, Dr. Chin's patients are required to wait until his permitted return, even where follow-up care would otherwise happen sooner.

4. In light of Dr. Chin's compliance with the conditions of his release for nearly three years, and to facilitate his ability to provide more advanced and better care to his patients in Jamaica, Dr. Chin respectfully requests that the limitation on his travel to Jamaica to once per month be changed to up to three times per month.

WHEREFORE, Dr. Chin respectfully requests that his conditions of release be modified by replacing the phrase "once per month" with "up to three times per month" in the condition that currently reads "Defendant is permitted to travel to Jamaica once per month only for the purpose of practicing medicine there, with the same conditions regarding travel outside the United States as stated above."

Respectfully submitted,

KINGSLEY CHIN

By his attorneys,

/s/ Joshua L. Solomon

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CERTIFICATE OF SERVICE

The undersigned certifies that this document, filed on September 3, 2024, through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joshua L. Solomon

RULE 7.1 CERTIFICATE

The undersigned certifies that he conferred with counsel for the government regarding this motion. The government requested that undersigned counsel note that the government takes no position.

/s/ Joshua L. Solomon